

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

**UNITED STATES OF AMERICA** §  
§  
v. § **NO. 4:19-CR-00160 (3)**  
§  
**RAFAEL RAMIREZ, Defendant** §

**MOTION FOR CONTINUANCE**

**TO THE HONORABLE JUDGE OF SAID COURT:**

Now comes RAFAEL RAMIREZ, Defendant in the above-entitled and numbered cause by and through his undersigned attorney and respectfully files this Motion for Continuance and would show the Court as follows:

1. The Plea Agreement Deadline in this matter is February 10, 2020 with the Pre-Trial Conference and associated events scheduled for March 2, 2020.
2. Counsel for Defendant respectfully requests that all events be deferred to later dates to allow for adequate time to further interview potential witnesses and to allow time to discuss case with the prosecutor.
3. Legal Assistant to counsel for the Defendant has conferred with Ms. Anissa Kaufman, Paralegal for Assistant U.S. Attorney, Ernest Gonzalez, Esq. Ms. Kaufman indicates that the request for continuance is unopposed.
4. This motion is not made for purposes of delay but that justice may be done.

**WHEREFORE, PREMISES CONSIDERED**, Defendant prays that his Motion for Continuance be granted.

Respectfully submitted,

THE LAW FIRM OF DERIC KING  
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By: /s/ Deric King Walpole  
Deric King Walpole  
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Attorney for RAFAEL RAMIREZ

**CERTIFICATE OF SERVICE**

This is to certify that on February 5, 2020, a true and correct copy of this motion was transmitted to Ernest Gonzalez at ernest.gonzalez@usdoj.gov.

/s/ Deric King Walpole  
Deric King Walpole

**CERTIFICATE OF CONFERENCE**

This is to certify that on February 4, 2020, Teri Newsome, (Legal Assistant to Deric King Walpole, counsel for the Defendant) conferred with Ms. Anissa Kaufman, Paralegal for Assistant U.S. Attorney, Ernest Gonzalez, Esq. Ms. Kaufman indicated that the request for continuance is unopposed.

*/s/ Deric King Walpole*  
Deric King Walpole

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**ORDER ON MOTION FOR CONTINUANCE**

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On this the \_\_\_\_\_ day of \_\_\_\_\_, 2020, the Court considered Defendant's Motion for Continuance. The Court finds that the Motion has merit and should be granted. **IT IS THEREFORE ORDERED that Defendant RAFAEL RAMIREZ'S Plea Agreement Deadline, Pretrial Conference, Jury Selection, and Jury Trial be reset to a future date agreed to by the parties and for other such relief that this Honorable Court deems just and right.**

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**UNITED STATES DISTRICT JUDGE**